



CERTIFICATE OF SERVICE

I, Julie A. Connor, hereby certify that 40 copies of the foregoing Brief of Former Attorney General Edwin Meese III and Law Professors Steven G. Calabresi and Gary S. Lawson as *Amici Curiae* Supporting Neither Party in 23-624, *United States v. Donald J. Trump*, were sent via Two Day Service to the U.S. Supreme Court, and 3 copies were sent via Two Day Service and e-mail to the following parties listed below, this 20th day of December, 2023:

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All parties required to be served have been served.

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I further declare under penalty of perjury that the foregoing is true and correct. This Certificate is executed on December 20, 2023.

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Subscribed and sworn to before me by the said Affiant on the date below designated.

Date: December 20, 2023

John D Gallagher

Notary Public

[seal]



JOHN D. GALLAGHER
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My Commission Expires
February 14, 2028